



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

## MEMORANDUM

Date: April 5, 1993

To: Jim Janssen

Attn: Fred Nika

From: James O'Brien

By: Ron Doughty *RH*

Subject: Site Safety Plan

Ref: Winnebago Reclamation Landfill Site

L201 SOS 0001



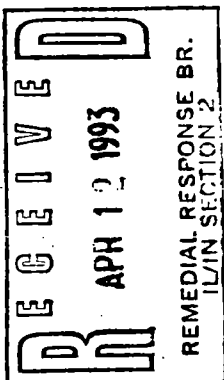
### SUMMARY

With the changes additions or corrections identified in the following text, this site safety plan will be acceptable. The project managers should assure that the modifications are effected before acceptance is finalized.

### CAVEAT

Our review of the health and safety protocols established in this Site Safety Plan are based on the site conditions and chemical hazards known and/or anticipated to be present from available site data. The possibility of undocumented contamination within the site requires a conservative approach to on-site safety procedures. The following review comments are predicated on use only with the proposed activities described in the site investigation work plan. Since specifications herein are subject to review and revision based on actual conditions encountered in the field during site characterization activities, the Agency can only review the document for completeness with OSHA 29 CFR 1910.120(b)(4)(ii) A through J. Therefore, acceptance of the original or any final revision does not imply either acceptance or disapproval of the SSP.

Note that all auxiliary operations and equipment which may be on-site but not covered specifically in the site safety plan must comply with applicable parts of OSHA 29 CFR 1910 and 1926.



### REVIEW DETAIL

ANY AND ALL DEFICIENCIES NOTED MUST BE CORRECTED OR CLARIFIED IN A CONCISE AND FORTHRIGHT MANNER.

### Introduction

No apparent deficiencies are noted in this section.

#### A. Safety and Health Analysis

Drill rig safety procedures are needed and have not been provided.

#### B. Employee Training

No apparent deficiencies are noted in this section.

#### C. Personal Protective Equipment

The acronym, OHMTADS, should be defined.

#### D. Medical Surveillance

On page 6-1 in the last paragraph the words "below" should be changed to "above" in the phrase "If measurements are below 110 beats per minute, below 99 degrees fahrenheit..."

#### E. Air Monitoring/Environmental Sampling

The air monitoring protocol is not in compliance with 29 CFR 1910.120(h). The standard indicates that monitoring in general will be performed in order to make sure that the appropriate engineering controls and personal protective equipment are adequate for the job task being performed. This is also to insure that permissible exposure limits are not exceeded. Some of the things to be done include: air and personal monitoring, identification of IDLH situations, periodic monitoring, and monitoring of high risk employees. The use of only direct reading instruments is insufficient.

On page 7-1 the meaning of the note is not clear.

On page 7-2 it is stated that work will be continued in atmospheres containing combustible gases up to 40% LEL. This would be an extremely hazardous practice which would exceed the limits of all OSHA standards. A limit of 10% LEL is recommended.

#### F. Site Control

No apparent deficiencies are noted in this section.

#### G. Decontamination

Realizing the location of decontamination facilities may change with changing site conditions, please state initial location of personnel and equipment decon area(s).

Decontamination rinsate collection procedures have not been addressed.

**H. Emergency Response/Contingency Planning**

No apparent deficiencies noted in this section.

**I. Confined Space Entry**

A Confined Space Entry Program is apparently not required.

**J. Spill Containment Program**

No apparent deficiencies are noted in this section.

**CONCLUSION**

The Site Safety Plan will be acceptable if revised to include the nominal corrections and clarifications identified above. The project manager may ascertain the adequacy of the indicated changes and need not necessarily resubmit the revision to OCS. Should questions arise feel free to contact the author or other staff of the Health and Safety Unit at 5-9481.